

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

NATIONWIDE JUDGMENT RECOVERY,
INC., as Assignee of Matthew E. Orso, in his
capacity as successor court-appointed
Receiver for Rex Venture Group, LLC d/b/a
ZEEKREWARDS.COM for Receiver
KENNETH D. BELL,

Plaintiff

v.

REYNALDO P. PEREZ, SSN xxx-xx-5030 (a
member of the DEFENDANT CLASS OF
NET WINNERS in **ZEEKREWARDS.COM**);
TODD DISNER, et al.,

Defendants

v.

**TD AMERITRADE HOLDING
CORPORATION,**

Garnishee.

CIVIL ACTION NO. 3:21-mc-00293-L

**GARNISHEE TD AMERITRADE'S ORIGINAL ANSWER
TO WRIT OF GARNISHMENT**

TO THE HONORABLE COURT:

NOW COMES Garnishee TD Ameritrade Holding Corporation (“Garnishee” or “TD Ameritrade”) and files this its Original Answer to the Writ of Garnishment after Judgment which was served on Garnishee and would respectfully show as follows:

I.

The Writ of Garnishment was served on Garnishee on June 13, 2022.

II.

On the date the Writ of Garnishment was served, and on the date of this answer, Defendant Reynaldo P. Perez had two accounts at TD Ameritrade: Account No. XXX-XX5813 (in the name of “Reynaldo Pedrola Perez”) and Account No. XXX-XX0132 (in the name of “Reynaldo Pedrola Perez Rollover IRA”) (collectively, hereinafter the “Perez Accounts”). On the date the Writ of Garnishment was served and on the date of this answer the Perez Accounts had the values indicated below:

	Date Served	Date of Answer
Account No. XXX-XX5813	\$31.73	\$31.73
Account No. XXX-XX0132	\$25,797.83	\$20,357.05

III.

The assets contained in the Perez Accounts consist of cash and securities. As of the date of this Answer, the assets in the accounts have not changed, although the account values may fluctuate because of possible dividends and interest, and market fluctuations. The assets held in the Perez Accounts are still held in the respective names set out above.

IV.

Garnishee does not know of any other persons who are indebted to Defendant Reynaldo P. Perez, or have effects belonging to said Defendant in their possession.

V.

Garnishee has engaged the undersigned attorney to represent it in this proceeding. Garnishee has agreed to pay its attorneys reasonable attorneys’ fees for the representation in this matter. As a result, Garnishee seeks to recover its necessary and reasonable attorneys’ fees, as well as costs.

TD AMERITRADES ORIGINAL ANSWER

TO WRIT OF GARNISHMENT – Page 2

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WHEREFORE, PREMISES CONSIDERED, Garnishee TD Ameritrade prays that the Court enter Judgment as it deems proper and award TD Ameritrade recovery for costs and expenses, including reasonable attorneys' fees, and for such other relief as to which it may be justly entitled.

Respectfully submitted,

THOMPSON, COE, COUSINS & IRONS, L.L.P.

By: /s/ William N. Radford
William N. Radford
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**ATTORNEYS FOR GARNISHEE
TD AMERITRADE, INC.**

CERTIFICATE OF SERVICE

This is to certify that on this the _23rd day of June, 2022, true and correct copies of the foregoing document were served electronically via the Court's CM/ECF system to all those entitled to receive service and to all other parties , as follows:

Robert C. Newark, III
A Newark Firm
1341 W. Mockingbird Lane, Suite 600W
Dallas, TX 75247
Attorneys Plaintiff

Reynaldo P. Perez
5908 End O Trail
Fort Worth, Texas 76112

**Via Certified Mail
Return Receipt Requested**

/s/ William N. Radford
William N. Radford

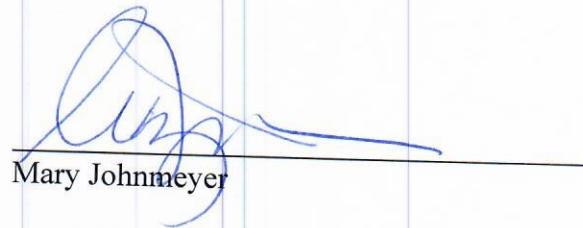
DECLARATION OF MARY JOHNMEYER

Pursuant to 28 U.S.C. § 1746, the undersigned states as follows:

1. I am Mary Johnmeyer. I am over the age of twenty-one (21) and am fully competent to make this Declaration. I have personal knowledge of the facts stated herein, which are true and correct.

2. I declare under penalty of perjury that I am the duly authorized agent of Garnishee TD Ameritrade in the above-entitled and numbered proceeding; that I have read the foregoing Answer of Garnishee TD Ameritrade; and that every statement contained in said Answer is within my personal knowledge, or is to the best of my personal knowledge, information, and belief, true and correct.

Executed on: June 23, 2022.



Mary Johnmeyer

A handwritten signature in blue ink, appearing to read "Mary Johnmeyer", is written over a horizontal line. The signature is fluid and cursive.